Cultural Resources Management Impact Assessment:

(PORTIONS OF) ETTRICK 182; HOPETOWN DISTRICT, NORTHERN CAPE, SOUTH AFRICA

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REPORT TO -

IDA MURBANIE & MARIE PETERSON BASADI BA TLOU Tel: 072 1455 492; 90 Transvaal Rd, Kimberley, 8301; E-mail: karen@museumsnc.co.za

JUSTICE THEKISHO
DIAMROQ
Tel: 084 622 3493; 18857 Thesele Street, Galeshewe, Kimberley, 8301; E-mail: karen@museumsnc.co.za

ATTENTION -

MARY LESLIE
SOUTH AFRICAN HERITAGE RESOURCES AGENCY (SAHRA)
Tel: (021) 462 4502; Fax: (021) 462 4509; P.O. Box 4637, Cape Town, 8000; E-mail: mleslie@sahra.org.za

PREPARED BY -

KAREN VAN RYNEVELD
McGREGOR MUSEUM, ARCHAEOLOGY DEPARTMENT, CRM UNIT
Tel: (053) 839 2700; Fax: (053) 842 1433; P.O. Box 316, Kimberley, 8300; E-mail: karen@museumsnc.co.za

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1) Project Brief

The McGregor Museum CRM Unit was contracted by the developers, Basadi Ba Tlou and Diamroq, to conduct a Phase 1 Cultural Resources Management (CRM) impact assessment. The impact assessment was requested in compliance with mining permit / right environmental requirements as set out in the Mineral and Petroleum Resources Development Act (MPRDA), No 28 of 2002, represented by the Department of Minerals and Energy (DME), the particulars of which are described in the National Environmental Management Act (NEMA), No 107 of 1998, represented by the Department of Environmental Affairs & Tourism (DEAT) and the National Heritage Resources Act (NHRA), No 25 of 1999, represented by the South African Heritage Resources Agency (SAHRA).

This document reports on the findings of the CRM assessment.

2) The CRM Assessment

PROPERTY DESCRIPTION:

The proposed localised mining development is situated on a cumulative 4.2 ha portion on the property known as Ettrick 182 in the Hopetown District of the Northern Cape, South Africa (1:50,000 map reference: 2923BD Torquay).

DEVELOPMENT IMPACT:

Proposed development, pick and shovel and limited mechanised mining, will impact on three separate areas, of a cumulative 4.2 ha area on the property Ettrick 182. (ETT1: Ida Murbanie, Basadi Ba Tlou - 1.5 ha; ETT2: Marie Peterson, Basadi ba Tlou - 1.5 ha; ETT3: Justice Thekisho, Diamroq - 1.2 ha).

Existing access roads to the proposed development areas and are currently used for farming activities.

Mining is expected to impact on the total of the cumulative 4.2 ha area. Mining will result in the total loss of surface and subsurface context of cultural material.

CRM ASSESSMENT METHODOLOGY:

One McGregor Museum CRM Unit staff member visited the site on 2005-10-08. The assessment was limited to a Phase 1 surface survey. No excavation or subsurface testing was done since a permit from SAHRA is required to do so. GPS co-ordinates were taken with a Garmin e-trex vista GPS (5-8 m error margin). Photographic documentation was done with a Casio exilim EX-S2 camera.

The assessment covered:

- i. Access road(s) to the proposed development areas:
- ii. Proposed development areas ETT1, ETT2 and ETT3 (4.2 ha).

In accordance with current legislation no development had started prior to the CRM impact assessment.

CRM ASSESSMENT FINDINGS:

i EXISTING ACCESS ROADS:

Access to the proposed development area is via existing farm roads. Access roads exceed 300m and will form an integral part of the mining area; impact thereon or any alteration thereto is covered by the MPRDA (2002), NEMA (1998) and the NHRA (1999).

Access roads to the proposed development area currently cross-cuts trough the identified archaeological site. The roads are however already established, having been made and used extensively by former mining operations in the area on a much larger scale than necessary for the proposed localised development. The proposed development will make use of existing roads throughout the course of the applied for mining development.

PROPOSED DEVELOPMENT AREAS ETT1, ETT2 AND ETT3:

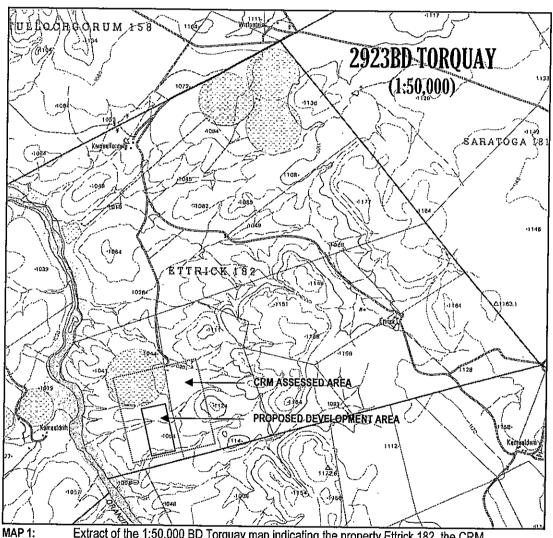
Proposed development will impact on a 4.2 ha area. Impact on the area or any alteration thereto is covered by environmental requirements as set out in the MPRDA (2002), the NEMA (1998) and the NHRA (1999).

Assessment of the area was limited to a surface survey. Open sections due to prior mining provided sub-surface information and interpretation.

The three proposed development areas border one another directly forming a single impact area.

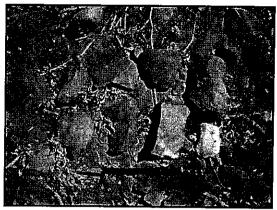
The total of the proposed area comprises of a Middle Stone Age site, based on tool size, probably representative of the earlier phase of the Middle Stone Age. The site has an approximate sub-surface depth of 30-40cm, as discerned from a number of un-rehabilitated open mines situated in the particular applied for and surrounding area. Identified artefacts were predominantly produced on flakes and blades. Cores, formal tools (scrapers, points, convergent flakes, denticulates and notched scrapers) and debitage were identified.

The site stretches for kilometres in a number of directions across the surrounding hills. It was not possible to demarcate the site boundary during the assessment.



AP 1: Extract of the 1:50,000 BD Torquay map indicating the property Ettrick 182, the CRM assessed area and the proposed development area (ETT1, ETT2 and ETT3).

3) Image Gallery



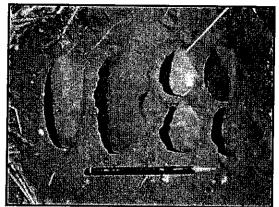


IMAGE 1 & 2: Collections of MSA artefacts from the site



IMAGE 3: In situ view of surface artefacts



IMAGE 4: Section of historic diggers pit within the proposed development area

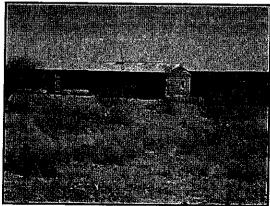


IMAGE 5: Farm worker's cottage situated directly adjacent to the proposed development area

4) Conclusion

The total of the proposed development area comprises of an earlier Middle Stone Age site. The site however stretches over a large area, covering the surrounding hills and all former mined areas visited during the survey. The extent of the site could not be determined during the survey. The proposed development will thus impact negatively on a small portion of the site.

5) Recommendations

I would recommend that the proposed pick and shovel and limited mechanised 4.2 ha mining development proceed as applied for.

Prior to any extension of the development area a thorough regional assessment of the site with an associated archaeological mitigation management plan should be submitted. The developer will be responsible for mitigation requirements, as per the MPRDA (2002), the NEMA (1998) and the NHRA (1999), prior to development not included in the current application.

6) Acknowledgements

I would like to thank Ida Murbanie, Marie Peterson (Basadi Ba Tlou) and Justice Thekisho (Diamroq) for providing mining and on-site information.

McGregor Museum, Department of Archaeology, CRM Unit		
Name	Designation	ASAPA Accreditation
David Morris	Head of Archaeology	Principal Investigator
Karen van Ryneveld	Archaeologist	Field Director

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